

# EXHIBIT 11

Joshua Glasscock,  
Plaintiff,  
vs.  
SIG Sauer, Inc.,  
Defendant

Deposition of Joshua Glasscock  
Case No.: 6:22-cv-3095

DATE TAKEN: Tuesday, May 16, 2023

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1 A: 2014.

2 Q: Any other post-high school education?

3 A: No.

4 Q: Okay. Ever attend any trade school?

5 A: No.

6 Q: Okay. Any technical experience or background, based  
7 on work experience, anything like that?

8 A: No.

9 Q: Okay. Uh, did you serve in the military?

10 A: No.

11 Q: Okay. Are you currently employed, sir?

12 A: Yes.

13 Q: And who's your employer?

14 A: The Greene County Sheriff's Office.

15 Q: And are you employed as a law enforcement officer?

16 A: Yes, I work in the jail. I'm a jailer.

17 Q: And how long have you been a jailer for the Greene  
18 County Sheriff's Office?

19 A: Since September of 2014.

20 Q: And would that be your first employment  
21 post-graduation from college?

22 A: No.

23 Q: Okay. Where else were you employed between your  
24 graduation from college and when you started at Greene County  
25 Sheriff's Office?

1           Q:     Okay. Did you carry a firearm while on duty with  
2 the Henry County, uh, Sheriff's Office?

3           A:     Yes, during transports.

4           Q:     Okay. And that-- during transport to mean when you  
5 were transporting prisoners from one location to another?

6           A:     Correct.

7           Q:     Okay. And what firearm did you carry while you were  
8 employed by the Henry County Sheriff's Office?

9           A:     It was a Glock 23.

10          Q:     Okay. And that's a firearm you bought personally?

11          A:     Yes.

12          Q:     Okay. And when you were qualified by the Henry  
13 County Sheriff's Office, what did that mean? I mean, were you  
14 given training? Was it just shooting practice, or something  
15 else?

16          A:     It was essentially shooting practice where they  
17 trained me, that they were comfortable with me carrying a  
18 firearm.

19          Q:     Uh, did you have any-- any, uh, related classroom  
20 instruction in connection with being qualified by the Henry  
21 County Sheriff's Office?

22          A:     No.

23          Q:     Okay. Other than the Glock 23, which was your  
24 personal weapon and you used while employed with the Henry  
25 County Sheriff's Office, is there any other firearm that you

1 Q: Okay. Thank you. Um, tell me briefly when you  
2 first learned and how you first learned about firearms, and  
3 safe firearms handling. I mean, you know, was it as a kid, you  
4 grew up with them, was it something else?

5 A: I've grew up with firearms and rifles, hunting with  
6 my family at a very young age. I couldn't-- I couldn't tell you  
7 the first time I shot a gun.

8 Q: Okay. Um, and unless I say otherwise, I'm really  
9 gonna focus on handguns, so not rifles and shotguns, which I  
10 understand you used. But, um, how did you learn about firearm  
11 safety with handguns? Is it something that your-- you know,  
12 your dad or your grandfather taught you, or did you take a  
13 class or something else?

14 A: How I first learned was from my grandfather and my  
15 dad teaching me how to safely handle firearms.

16 Q: And would this include handguns?

17 A: Yes.

18 Q: And do you recall what, uh, model handguns you used  
19 when you were a kid when your grandfather and father were  
20 teaching you about handgun safety?

21 A: I can't recall specifically.

22 Q: Okay. Um, do you know what the difference is  
23 between a revolver and a semi-automatic pistol?

24 A: Yes.

25 Q: Okay. When you were learning about handgun safety

1 referred to?

2 A: Uh, my limited understanding is how many steps it  
3 is before the-- the bullet would come out of the gun.

4 Q: What do you mean, how many steps it is?

5 A: How many safeties or retention there are on the  
6 weapon.

7 Q: Okay. And what's that understanding based on? Just  
8 discussions and experience with firearms?

9 A: Yes.

10 Q: Do you know whether the P320 is a single-action or  
11 double-action, or neither?

12 A: I don't know.

13 Q: Okay. What was the first handgun that you bought  
14 personally?

15 A: It was a Taurus. It was a 380.

16 Q: Was it the TP?

17 A: I think it's called a TCP.

18 Q: TCP. Okay. And when, approximately, did you-- did  
19 you buy that Taurus TCP, if you recall?

20 A: Approximately 2010 time frame.

21 Q: Okay. And why were you purchasing a pistol in or  
22 around 2010? Was it to use as concealed carry or something  
23 else?

24 A: I just wanted a pistol.

25 Q: Okay.

1 Q: Did you sell your Glock before you purchased that  
2 320 or after?

3 A: I believe it was after.

4 Q: And you sold the Glock to one of your neighbors?

5 A: Yes.

6 Q: Uh, did you ever have any issues with your Glock,  
7 uh, while using it?

8 A: No.

9 Q: Okay. Why did you decide to move from a Glock 23 to  
10 the P320?

11 A: Because the Glock 23 was a 40-caliber, and the P320  
12 was a 9-millimeter.

13 Q: Okay. So you wanted to change calibers?

14 A: Yep.

15 Q: Why?

16 A: Because the ammo for a 40 caliber is more  
17 expensive.

18 Q: Now, I may have asked you this, and I apologize.  
19 But your current employer, do you-- do you carry a firearm at  
20 all on duty, uh, with that employer?

21 A: No.

22 Q: Okay. So you're not involved in the transport of  
23 prisoners anymore, or you just don't carry a firearm when you  
24 do that?

25 A: I'm not involved in it.

1 Q: Okay. Um, the Glock 23 does not have a manual thumb  
2 safety, correct?

3 A: Correct.

4 Q: Um, the Glock 23 has a, uh, what I'll refer to as a  
5 tabbed trigger or a belated trigger; is that correct?

6 A: Yes.

7 Q: Okay. Do you know what the purpose of a tabbed  
8 trigger is?

9 A: It's so that it doesn't go off. It's a-- it's an  
10 extra safety mechanism for the trigger so that your finger is  
11 fully on the trigger to pull it.

12 Q: And what is the basis of that understanding, that a  
13 tabbed trigger is designed to ensure your finger is fully on  
14 the trigger when it's pulled?

15 A: Just my experience with it.

16 Q: Okay. Do you know if a tabbed trigger plays any  
17 role in the drop safety of a pistol?

18 A: I don't know.

19 Q: Okay. Have you ever read, uh, information on  
20 Glock's website or in Glock's, uh, advertisements about the  
21 purpose of the tabbed trigger?

22 A: No.

23 Q: Have you ever-- ever read any information about why  
24 a tabbed trigger was initially included on Glocks?

25 A: No.



1 Q: Okay. So your testimony that it's to ensure your  
2 finger is fully on the trigger, just based on your experience  
3 in shooting the Glock; is that fair?

4 A: Yeah, that's fair.

5 Q: Okay. And so in addition, uh, to moving from a  
6 40-caliber to a 9-millimeter, were you looking to move from a  
7 compact pistol to a full-size pistol when you purchased your  
8 P320?

9 A: That was in my thought process, yes.

10 Q: Okay. And why did you want to move from a compact  
11 to a full-size pistol?

12 A: It's purely out of preference.

13 Q: Okay. Um, now, going back to your Taurus TCP, I  
14 didn't ask this. Did that have a manual thumb safety?

15 A: No.

16 Q: And does it have a tabbed or belated trigger?

17 A: No.

18 Q: Are there any external safeties on the Taurus TCP?

19 A: No.

20 Q: And just based on my review, the Taurus TCP is-- is  
21 a sub-compact, right? It's a very small pistol?

22 A: Very small, yes.

23 Q: Okay. And what caliber is your t-- oh, it's a 380,  
24 right?

25 A: Correct, yes.

1           A:       No.

2           Q:       Okay. And I forgot to ask this, but are you  
3 familiar with, uh, an item called a grip safety?

4           A:       I'm not very familiar with it, no.

5           Q:       Okay. So your Glock 23 and your Taurus TCP, is  
6 there a piece or button on the rear of the handle that is  
7 depressed once you wrapped your hand around the grip module?

8           A:       No.

9           Q:       Okay. That would be a grip safety. And I-- I  
10 didn't believe either one of those had a grip safety, but I  
11 wanted to make sure. Um, so now, I want to talk about your  
12 purchase of the P320 pistol. Um, just for your reference, it's  
13 inter-- Interrogatory Response Number 5, um, has that  
14 information. So, um, according to your response, you purchased  
15 the P320 in or around, uh, March or April of 2020; is that  
16 correct?

17          A:       Yes.

18          Q:       And who did you purchase it from?

19          A:       James Faulkner.

20          Q:       And Mr. Faulkner was a, uh, co-worker with the--  
21 the Sheriff's Office?

22          A:       Yes.

23          Q:       Can you remind me the name of the Sheriff's Office  
24 you work for currently?

25          A:       Greene County.

1 problems or issues with the P320 before he sold it to you?

2 A: He had no mechanical issues of it jamming or  
3 anything like that.

4 Q: Okay. Do you know whether the P320 had undergone  
5 any maintenance, you know, beyond just basic cleaning, uh,  
6 prior to your purchase of it?

7 A: Not to my knowledge.

8 Q: Okay. Is that something you think he would have  
9 told you if-- if, uh, it had?

10 A: Yes.

11 Q: Okay. Um, do you know why Mr. Faulkner wanted to  
12 sell his P320?

13 A: Uh, his wife didn't want the pistol in his house  
14 because it didn't have a safety on it.

15 Q: Do you know why she didn't want a pistol with-- and  
16 when you say didn't have a safety, you mean no external safety?

17 A: Correct.

18 Q: Do you know why his wife did not want a pistol with  
19 an external safe-- without an external safety in their house?

20 A: Because it would be too easy for someone to pull  
21 the trigger on it.

22 Q: Mr. Faulkner have kids?

23 A: Not at the time.

24 Q: Okay. So when you purchased the P320 from Mr.  
25 Faulkner, you understood that it didn't have any external

1       safeties, correct?

2           A:       That was my understanding.

3           Q:       Okay. And when you got the gun, you realized it  
4       didn't have a manual thumb safety or a tabbed or belated  
5       trigger, correct?

6           A:       Yes.

7           Q:       Okay. When you purchased the pistol from Mr.  
8       Faulkner, did you express any concerns about the lack of safety  
9       on the pistol?

10          A:       You-- you broke up slightly. Can you repeat that?

11          Q:       Sure. When you purchased the P320 pistol from Mr.  
12       Faulkner, did you express any concerns about the lack of an  
13       external safety on the pistol?

14          A:       No.

15          Q:       Did you have any concerns about the lack of an  
16       external safety on the pistol?

17          A:       My-- it-- it crossed my mind, but I wasn't  
18       concerned with it like his wife was.

19          Q:       Did you have any discussions with him about why his  
20       wife was concerned?

21          A:       They were trying to have a baby, and they didn't  
22       want a pistol that was so easy to fire.

23          Q:       When you say it's so easy to fire, what do you  
24       mean?

25          A:       All that was stopping the firearm from going off

1           Q:     Okay. Did you have any discussions with any of, uh,  
2           those acquaintances who are former military about whether the  
3           P320, whether it'd be the military version or not, came with a  
4           manual thumb safety as an option?

5           A:     Safety wasn't discussed. Safety mechanisms.

6           Q:     Okay. What is your understanding of how a manual  
7           thumb safety works?

8           A:     My limited understanding would be that a thumb  
9           safety prevents the trigger from being pulled.

10          Q:     So it locks the trigger, um, and means you can't  
11          pull it, correct?

12          A:     Yes.

13          Q:     Any understanding of how the thumb safety locks the  
14          trigger, like, internally?

15          A:     No.

16          Q:     Okay. Now, when you purchased, uh, your P320 from  
17          Mr. Faulkner, he provided you the box for the pistol; is that  
18          correct?

19          A:     Yes.

20          Q:     And did he provide an owner's manual that came with  
21          the pistol?

22          A:     Yes.

23          Q:     Okay. Do you have a copy of the owners manual in  
24          front of you, either the-- yours, or the one that I had sent to  
25          your Counsel?

1           A:       I have mine.

2           Q:       Okay. Um, you can look at it. And your Counsel  
3 provided me with the part number on the back to-- just to make  
4 sure we're looking at the same, uh-- the same document. But if  
5 you could look at the back of your owner's manual and-- oh,  
6 sorry. I didn't realize-- you know what? Let's can we go off  
7 the record and take five minutes for a comfort break?

8           MR. SOWERS:       That's fine. Yes.

9           MR. GIBSON:       Okay.

10          THE REPORTER:       Yes. We are now off the  
11 record. And the time is 11:42 a.m., Central Time. We are now  
12 back on the record and the time is 11:49 a.m., Central Time.

13          (CONTINUING DIRECT EXAMINATION BY MR. GIBSON)

14          Q:       Okay. Mr. Glasscock, do you have the owner's  
15 manual in front of you?

16          A:       Yes, sir.

17          Q:       Okay. If you look at the back down at the bottom,  
18 there's a part number. It says, P/N, you see that?

19          A:       Yes.

20          Q:       Does yours say 8501909-01 Rev 01?

21          A:       Yes.

22          Q:       Okay. So I'm gonna use that as an exhibit, that'll  
23 be Glasscock Exhibit 2. I just wanted to make sure I was using  
24 the same one that you have. Um, now, when you received the  
25 owner's manual from Mr. Faulkner, did you read it?

1           A:     No.

2           Q:     Okay. Have you ever read the owner's manual for  
3 your P320 pistol?

4           A:     No.

5           Q:     Ever flipped through it, skimmed it, anything like  
6 that?

7           A:     I mean, I might have when I bought it, just flipped  
8 through it. But--

9           Q:     Okay.

10          A:     --didn't read it cover to cover or anything.

11          Q:     If you can turn to Page 16, and at the top it  
12 should say, 2.0 Mechanical Characteristics and Theory of  
13 Operation. Do you see that?

14          A:     Yes.

15          Q:     And you see about midway down the page, it says,  
16 2.1.2 Principal Features?

17          A:     Yes.

18          Q:     And then the last line you see, where it says the  
19 P320 is offered with an optional ambidextrous manual safety. Do  
20 you see that?

21          A:     Yes.

22          Q:     Do you recall ever reading that, that the P320 was  
23 offered with an optional ambidextrous manual safety?

24          A:     No, I don't recall. Like I said, I didn't read the  
25 manual.

1 Q: Okay. So you were specifically looking for a 320  
2 before you had any discussions with Mr. Faulkner?

3 A: That's true.

4 Q: And why were you looking for a 320?

5 A: Because it was a good weapon. It had been issued to  
6 the military, and if it was good enough for them, it was good  
7 enough for me.

8 Q: Okay. And you were looking for a P320 to replace  
9 your Glock 23?

10 A: Yes.

11 Q: And why were you looking to get rid of the Glock?  
12 You just wanted something different or?

13 A: Just wanted something different. I wanted to go to  
14 9-millimeter, like I said.

15 Q: Okay. And the Glock was a 40-caliber, you said?

16 A: Yes.

17 Q: Got it. So you wanted to switch because of the cost  
18 of ammo?

19 A: Yes.

20 Q: Okay.

21 A: One of--

22 Q: <crosstalk> Um-- say it again?

23 A: One of many. I mean, yes. I wanted a d-- a fuller,  
24 bigger gun. Yes.

25 Q: Okay. So you wanted bigger gun, change ammunition.



1           A:       I'm-- I'm sure all of the research online indicated  
2       that the SIG Sauer P320 was a good pistol.

3           Q:       Um, do you recall any of the websites you looked at  
4       that indicated that the P320 was a good pistol?

5           A:       I don't recall any specific websites.

6           Q:       And do you recall when approximately you started  
7       this research? I mean, if you purchased it in April of 2020,  
8       did you start a month before, six months before, something  
9       else?

10          A:       Probably periodically, over the two months prior.

11          Q:       Okay. Um, in any of your research about the 320  
12       in-- you know, the early part of 2020, do you recall reading  
13       anything about the voluntary upgrade program for the 320?

14          A:       I never saw anything about that.

15          Q:       As you sit here today, do you know what the  
16       voluntary upgrade program for the 320 is?

17          A:       Not the details of it, no.

18          Q:       Do you have any understanding that the 320 was  
19       subject to a voluntary upgrade program?

20          A:       Repeat-- repeat that again?

21          Q:       Yeah. As you sit here today, do you-- are you aware  
22       the P320 was subject to a voluntary upgrade program?

23          A:       As I sit here today, yes.

24          Q:       Okay. And what's your understanding of what the  
25       voluntary upgrade program was designed to accomplish?

1           Q:     I-- I agree it would come up. My question is, did  
2 you actually go to the website and review the information  
3 there?

4           A:     I can't imagine why I wouldn't have.

5           Q:     Okay. Do you recall any of the information that was  
6 provided on SIG Sauer's website in early 2020 about the P320?

7           A:     Nothing specific.

8           Q:     Okay. Is there anything on SIG Sauer's website  
9 about the P320 that you relied on in making your decision to  
10 purchase a P320?

11          A:     Like I said, I can't recall any of my specific  
12 websites or research.

13          Q:     Okay. So as you sit here today, you don't recall  
14 any information you saw on SIG Sauer's website that factored  
15 into your decision to purchase the P320?

16          A:     Not specifically.

17          Q:     Okay. Do you recall whether SIG Sauer's website  
18 contained information about the military selection of the P320  
19 as its new handgun when you went on the website in early 2020?

20          A:     Like I said, I can't recall specifically what  
21 websites I went to.

22          Q:     Okay. But you're sure you would have visited SIG  
23 Sauer's website, correct?

24          A:     Um, yes. I am.

25          Q:     Okay. And when you were on SIG Sauer's website, you

1 P320 go off in their holsters and people were being injured.

2 Q: Okay. And you say, after you were notified and--  
3 and that, again, you're talking about by-- by your attorneys?

4 A: Yes.

5 Q: Okay. So once you, uh-- you were aware of that,  
6 then you started doing research and you read stories about  
7 people alleging their-- their P320s were going off in their  
8 holster; is that fair?

9 A: That's fair.

10 Q: Okay. But prior to learning about, uh, this issue  
11 from your attorneys, did you have any other source of knowledge  
12 indicating an issue or problem with your P320?

13 A: Prior to my attorneys contacting me, I thought I  
14 had the military's version of the SIG Sauer P320.

15 Q: Okay. And that was based on your research that you  
16 did prior to purchase, correct?

17 A: That's correct.

18 Q: Okay. Um, at any point, uh, prior to this lawsuit  
19 being filed, did you ever contact SIG Sauer for any reason  
20 regarding your P320?

21 A: No.

22 Q: Um, putting aside the issue and why you stopped  
23 using your 320, which I understand. Uh, prior to that, did you  
24 have any issues with your P320, either functionally,  
25 mechanically, or-- or otherwise?

1           A:       No.

2           Q:       Okay. Do you recall approximately when you stopped  
3 using your P320?

4           A:       Uh, you would have to refer-- I would have to-- I  
5 don't know the specific month. Probably about a year ago,  
6 maybe, whenever my attorneys contacted me.

7           Q:       Okay. Um, so maybe I'll ask it this way.  
8 Approximately how long after you purchased the 320 did you use  
9 it before you determined it was dangerous?

10          A:       Can you repeat that?

11          Q:       Yeah, I-- I'm-- you know, I'm trying to not get  
12 into your conversation with your attorney. But I-- I want to  
13 get a sense for how long you used your 320 before you  
14 determined it was dangerous. So did you have it for a year? Was  
15 it six months? You know, something else?

16          A:       Uh, I would have to do math and-- okay, look at--  
17 when I purchased it from James Fauckner and look at the time  
18 when my attorneys contacted me. So whatever that subtraction  
19 mathematics is, is how long.

20          Q:       <crosstalk> Do you-- do you know when-- and I don't  
21 want to get into substance, but do you know when the attorneys  
22 contacted you? Any idea when that was?

23          A:       It feels like it was approximately a year ago.

24          Q:       Okay. Um, so during the time between you purchased  
25 it and when your attorneys contacted you, uh, how often did you

1 recall specifically looking at before you sold?

2 A: Yes.

3 Q: So, what-- what are you claiming is wrong with your  
4 320? Is it that, in your view, it's possible for it to fire  
5 without the trigger being pulled, or is there something else?

6 A: Yes, that it's capable of going off without the  
7 trigger being pulled. And that my weapon is something different  
8 than what I thought I was getting.

9 Q: And why do you say your weapon is different than  
10 something you thought you were getting? What does that mean?

11 A: Because the military got a SIG Sauer P320 and I  
12 have a SIG Sauer P320, but I have since learned that theirs is  
13 different because theirs has an external safety.

14 Q: Okay. So is-- is-- is that-- if your pistol had an  
15 external safety, would you still think it was dangerous?

16 A: Not as dangerous. I don't know the internal, why  
17 it's going off without the trigger being pulled either.

18 Q: Do you know if a manual thumb safety would have any  
19 impact on whether the pistol can go off without a trigger pull?

20 A: I'm not a gunsmith. I don't know the specifics of  
21 the internals, but I-- that could have bearing on it.

22 Q: So if it had a manual safety, it may prevent it  
23 from going off without a trigger pull?

24 A: In-- in my knowledge, I would say.

25 Q: Okay. Other than your attorneys, which I-- I-- I

1 the military, correct?

2 A: Correct.

3 Q: And I believe I asked you this, but I just wanna  
4 make sure. That was all based on online research. You didn't  
5 speak with anybody who indicated that to you, correct?

6 A: Correct.

7 Q: Okay. And as you sit here today, do you recall any  
8 of the websites you looked at that led you to believe the P320  
9 you were purchasing was the same as the military version?

10 A: Not specific websites.

11 MR. GIBSON: Okay. That's all the questions  
12 I have, sir. I thank you for your time. Uh, I don't know if  
13 Sander wants to ask you any questions, or if we're good to go?

14 MR. SOWERS: No questions.

15 MR. GIBSON: Okay.

16 MR. SOWERS: And we'll read and sign.

17 MR. GIBSON: <crosstalk> All right. All  
18 right. Thanks, Sander. Give Matt my best, and, uh, we'll be in  
19 touch soon.

20 THE REPORTER: Okay.

21 MR. SOWERS: <crosstalk> I'll do it real  
22 quick. Keith, did you want his Social Security number off the  
23 record?

24 MR. GIBSON: You want just email it to me,  
25 or?

## CERTIFICATE OF OATH AND TRUE TESTIMONY

Joshua Glasscock vs. SIG Sauer, Inc.  
CASE NUMBER: 6:22-cv-3095  
Littleton Park - Audrain, Missouri

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I, Dana Fulton, a Notary Public in and for the State of Missouri, County of St. Louis and the officer before whom the foregoing testimony was taken, do hereby certify that on 16th of May, 2023, Joshua Glasscock who advised they were located in the State of Missouri appeared before me via audio and video communication technology with the stipulation of the parties, and Joshua Glasscock being duly sworn and under oath, affirmed that the testimony they give during the foregoing proceeding shall be the truth, the whole truth, and nothing but the truth.

I, Dana Fulton, further certify that the foregoing transcript is a true and correct record of the testimony given by Joshua Glasscock which was taken by and before me with the aid of computer assisted stenographic transcription.

Produced Identification or Stipulation to Identity by the parties:

Driver's License

I, Dana Fulton, further certify that I am not a relative, employee, attorney, or counsel of any parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.



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Dana Fulton

NOTARY PUBLIC STATE OF Missouri  
COMMISSION NO. 21718828  
COMMISSION EXPIRES 03-02-2025

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